

Selman Breitman LLP  
ATTORNEYS AT LAW

1 CASEY J. QUINN  
2 NEVADA BAR NO. 11248  
3 SELMAN BREITMAN LLP  
4 3993 Howard Hughes Parkway, Suite 200  
5 Las Vegas, NV 89169-0961  
6 Telephone: 702.228.7717  
7 Facsimile: 702.228.8824  
8 Email: cquinn@selmanlaw.com

9 LINDA WENDELL HSU (Pro Hac Vice)  
10 CALIFORNIA BAR NO. 162971  
11 SAMUEL E. LIPSITZ (Pro Hac Vice)  
12 CALIFORNIA BAR NO. 331407  
13 SELMAN BREITMAN LLP  
14 33 New Montgomery, Sixth Floor  
15 San Francisco, CA 94105  
16 Telephone: 415.979.0400  
17 Facsimile: 415.979.2099  
18 Email: lhsu@selmanlaw.com

19 Attorneys for Defendant/Cross-Claimant  
20 NAUTILUS INSURANCE COMPANY

21  
22  
23  
24  
25  
26  
27  
28  
**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

16 ROBERT "SONNY" WOOD, an individual;  
17 ACCESS MEDICAL, LLC, a Delaware limited  
liability company,

18 Plaintiffs,

19 v.

20 NAUTILUS INSURANCE GROUP, a Delaware  
21 limited liability company, et al.,

22 Defendant.

23 NAUTILUS INSURANCE COMPANY,

24 Cross-Claimant,

25 v.

26 ROBERT "SONNY" WOOD; ACCESS  
27 MEDICAL, LLC; FLOURNOY  
MANAGEMENT, LLC AND ROES 1-10,  
inclusive,

28 Counter-Defendants.

Case No. 2:17-cv-02393-MMD-VCF

**ORDER**

**EXTENDING DEADLINE FOR NAUTILUS  
INSURANCE COMPANY TO RESPOND  
TO ROBERT "SONNY" WOOD'S AND  
ACCESS MEDICAL, LLC'S MOTION FOR  
RULE 37 SANCTIONS**

1           Defendant / Cross-Claimant NAUTILUS INSURANCE COMPANY (“Nautilus”), by and  
2 through its counsel of record, Selman Breitman LLP, and Plaintiffs / Counter-Defendants ROBERT  
3 “SONNY” WOOD and ACCESS MEDICAL, LLC (the “Insureds”; collectively, the “Parties”), by  
4 and through their counsel of record, The Schnitzer Law Firm, hereby submit the following  
5 Stipulation and [Proposed] Order extending the deadline for Nautilus to file its Response to the  
6 Insureds’ Motion for Rule 37 Sanctions [ECF No. 331] (the “Motion”).

7           The underlying motion to compel related to the Motion pertains to documents that Nautilus  
8 originally withheld based on a claim of attorney-client privilege (the “Documents”). Prior to the  
9 filing of the Motion, Nautilus had been contemplating whether to file a writ of mandamus with the  
10 Ninth Circuit Court of Appeals as it relates to the Court’s order (1) finding that the Documents are  
11 not subject to a claim of attorney-client privilege, and (2) instructing Nautilus to produce the  
12 Documents to the Insureds. However, Nautilus recently determined that it would not be proceeding  
13 with a writ of mandamus. Accordingly, Nautilus produced the Documents to the Insureds via email  
14 on October 24, 2022. Hard copies of the Documents were also sent to the Insureds via regular mail  
15 on the same day.

16           Given that Nautilus has complied with the Court’s order to produce the Documents,  
17 Nautilus’s counsel contacted the Insureds’ counsel and requested that the Insureds withdraw the  
18 Motion. Counsel for the Insureds responded that he has not had sufficient time to analyze the  
19 Documents and consider Nautilus’s withdrawal request. However, the Insureds’ counsel agreed to  
20 extend the deadline by one (1) week for Nautilus to respond to the Motion while counsel reviews  
21 the Documents and considers Nautilus’s request.

22           Accordingly, the Parties have agreed that the original deadline of October 31, 2022, for  
23 Nautilus to respond to the Motion will now be extended to November 7, 2022.

24           ///

1 IT IS SO STIPULATED.

2 DATED: October 28, 2022

3 SELMAN BREITMAN LLP

4 By:

/s/ Casey Quinn

CASEY J. QUINN

NEVADA BAR NO. 11248

LINDA WENDELL HSU (PRO HAC VICE)

CALIFORNIA BAR NO. 162971

SAMUEL E. LIPSITZ (PRO HAC VICE)

CALIFORNIA BAR NO. 331407

33 New Montgomery, Sixth Floor

San Francisco, CA 94105-4537

Phone: 415.979.2024

Facsimile: 415.979.2099

Attorneys for Defendant/Cross-Claimant

NAUTILUS INSURANCE COMPANY

11 DATED: October 28, 2022

12 THE SCHNITZER LAW FIRM

13 By:

/s/ Jordan Schnitzer

JORDAN P. SCHNITZER

NEVADA BAR NO. 10744

9205 W. Russell Road, Suite 240

Las Vegas, NV 89148

Phone: (702) 960-4050

Facsimile: (702) 960-4092

14 Attorneys for Defendants ACCESS MEDICAL,  
15 LLC and ROBERT CLARK WOOD, II

16  
17 **IT IS SO ORDERED:**

18 November 3, 2022

19 Dated: \_\_\_\_\_



20 \_\_\_\_\_  
21 Magistrate Judge Cam Ferenbach